

## **REMARKS**

Applicant has the following response to the Final Rejection of December 31, 2003.

### **Claim Rejections - 35 USC §103**

In the Final Rejection, the Examiner rejects Claims 8-35 under 35 USC §103 as being unpatentable over Yamazaki '027 and Akiyama. This rejection is respectfully traversed.

In his rejection, the Examiner mainly relies on Yamazaki '027 and contends that it discloses a method for manufacturing a semiconductor device; forming a gate electrode over a front side of a substrate; forming a semiconductor film over said gate electrode with a gate insulating film interposed there between; and forming a photosensitive film over said semiconductor film, and cites Fig. 39 and 520 in Yamazaki '027 in support thereof. The Examiner further asserts that 520 is a photo sensitive film.

Applicant disagrees with this characterization of Yamazaki '027. Numeral 520 is a black mask formed of a light shield conductive film and is used as an electrode (see e.g. col. 45, lns. 41-42 and 58 of Yamazaki).

Further, the step of forming a semiconductor film over said gate electrode with a gate insulating film interposed therebetween, is disclosed in the reference. As is clear from the figure, the TFT in Fig. 39 in Yamazaki '027 is a top-gate type TFT with a gate electrode over a semiconductor film. Hence, the semiconductor film is not "over" the gate electrode.

Further, the Examiner admits that Yamazaki '027 does not describe "the step of preparing a reflecting plate apart from a surface of said photosensitive film by a predetermined distance; to preparing a light source for emitting a light".

The Examiner, however, alleges that Akiyama describes "preparing a reflecting plate apart from a surface of said photosensitive film by a predetermined distance; to preparing a light source for emitting a light to provide a reflective surface that can be easily moved to desired positions, provide a light beam of larger diameter and minimize adverse effect of impurity particles in its path". In support thereof, the Examiner cites M1M2, M3, Fig. 1 and col. 1, lns. 25-26 in Akiyama. The Examiner then contends that it would have been obvious to modify the method of Yamazaki to incorporate the teaching of Akiyama to make the claimed invention. Applicant disagrees with the Examiner's contentions for at least the following reasons:

Akiyama is not directed to an exposure of a photosensitive film over a substrate. Instead, Akiyama is directed to a scale reader (see col. 1, lns. 7-8 therein). Therefore, one skilled in the art would not combine the teachings in Akiyama and Yamazaki, as suggested by the Examiner.

Furthermore, the Examiner appears to be relying upon the reflection from M2 and M3 in Akiyama for showing the claimed feature that the photosensitive film is irradiated from a back side of a substrate. However, reference numeral 1 of Fig. 1 in Akiyama is a "scale" but not a "substrate". Therefore, Akiyama fails to teach or suggest the claimed irradiation from a back side of a substrate. Moreover, there is no photosensitive film over the scale (the alleged substrate) in Akiyama.

While the Examiner appears to consider a scale of Akiyama the same thing as a substrate in the pending claims, they are completely different. More specifically the scale in Akiyama is used for diffracting the emitted laser beam and comprising a diffraction grating (e.g. col. 3, lns. 19-23 of Akiyama) while the substrate in the claimed invention is a base material on which a semiconductor device is formed. Therefore, they are very different.

Hence, Applicant cannot find any teaching about a step of forming a photosensitive film and

a step of irradiating said photosensitive film from a back side of the substrate, as recited in the claims in either Yamazaki '027 or in Akiyama.

Therefore, for at least the above-stated reasons, the claims of the present application are clearly not disclosed or suggested by the cited references but are patentable thereover.

### Conclusion

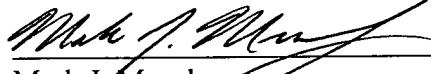
For at least the above stated reasons, it is respectfully submitted that the claims of the present application are in a condition for allowance and should now be allowed.

If any further fee is due for this amendment, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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